

1 Toni Meacham, WSBA 35068
1420 Scooteney Rd
Connell, WA 99326
2 (509)488-3289

3 Counsel for Brad Curtis Farms, LLC
4
5
6
7

8 **UNITED STATES BANKRUPTCY COURT**
IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

9 **In re:**

10 **EASTERDAY RANCHES, INC. et**
11 **al.,**
12 Debtors.

NO. 21-00141-WLH11

CH 11
JOINTLY ADMINISTERED

JOINDER ON MOTION FOR
ADEQUATE PROTECTION AND

OBJECTION TO ORDER
AUTHORIZING USE OF FINAL
CASH COLLATERAL

16
17 BRAD CURTIS FARMS, LLC., hereby joins in the motion of Weyns Farms and
18 Sunray Farms (ECF 273) in seeking a motion for adequate protection and in filing an
19 objection to Debtors final motion for use of cash collateral. Brad Curtis Farms, LLC also
20 joins in the motion to shorten time (ECF 277), notice of motion (ECF 276), and the
21 notice of hearing (278).
22
23

24 JOINDER ON MOTION FOR ADEQUATE PROTECTION AND
OBJECTION TO ORDER AUTHORIZING USE OF FINAL CASH COLLATERAL
Page 1

Toni Meacham
attorney at law
1420 Scooteney Rd
Connell, WA 99326
509-488-3289

1 1. Brad Curtis Farms, LLC provided feed per contract to Debtors and has not
2 received any post-petition payments. Although it is clear that the feed provided is being
3 utilized to feed cattle, it is unclear who is being compensated for that feed..

4 2. Brad Curtis Farms, LLC provided 21,402 bushes of high moisture corn to
5 Ranches in October 2020. Brad Curtis Farms, LLC remains unpaid for its 2020 feed
6 deliveries in the amount of \$112,655.85.

7 3. Brad Curtis Farms, LLC filed a lien statement with the WA Dept. of
8 Licensing with respect to this high moisture corn on March 4, 2021. Payment is not due
9 to begin until May 15, 2021.

10 4. Brad Curtis Farms, LLC delivered 134.81 net tons of high moisture corn to
11 the "Home Lot."

12 5. Brad Curtis Farms, LLC delivered 539.81 net tons of high moisture corn to
13 the "North Lot."

14 6. It is unclear whether this feed has been fed to cattle already or was in
15 existence at the time of filing. It is believed that the feed is co-mingled with other high
16 moisture corn that was delivered to the same locations.

17 7. Brad Curtis Farms, LLC has reviewed the Motion for Adequate Protection
18 and Objection to Debtors Final Motion to Use Cash Collateral and joins in those
19 motions, seeking the same remedy as requested in that motion.

1 Date
2 e

March 4, 2021

Signature
Name
Address

/s/ Toni Meacham

Toni Meacham Attorney At Law
1420 Scooteney Rd
Connell, WA 99326

24 JOINDER ON MOTION FOR ADEQUATE PROTECTION AND
OBJECTION TO ORDER AUTHORIZING USE OF FINAL CASH COLLATERAL
Page 3

Toni Meacham
attorney at law
1420 Scooteney Rd
Connell, WA 99326
509-488-3289